

***IN THE DISTRICT COURT OF THE UNITED STATES***  
***for the Western District of New York***

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**MARCH 2022 GRAND JURY**  
**(Impaneled March 25, 2022)**

**THE UNITED STATES OF AMERICA**

**INDICTMENT**

**-vs-**

**Violations:**

**TRISTIN PEARSON**

Title 18, United States Code,  
Sections 2251(a), 2251(e),  
2252A(a)(2)(A), 2252A(b)(1),  
2252A(a)(5)(B) and 2252A(b)(2)  
(3 Counts and Forfeiture Allegation)

**COUNT 1**  
**(Production of Child Pornography)**

**The Grand Jury Charges That:**

Between on or about January 1, 2018, and on or about March 27, 2018, in the Western District of New York, and elsewhere, the defendant, TRISTIN PEARSON, did knowingly employ, use, persuade, induce, entice and coerce, and did knowingly attempt to employ, use, persuade, induce, entice and coerce, a minor, that is, Victim 1, a person known to the Grand Jury, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported using any means and facility of interstate and foreign commerce; knowing and having reason to know that such visual depiction would be transported in and affecting interstate and foreign commerce; and which visual depiction was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; which visual depiction was actually

transported using any means and facility of interstate and foreign commerce; and which visual depiction was actually transported in and affecting interstate and foreign commerce.

**All in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).**

**COUNT 2**  
**(Distribution of Child Pornography)**

**The Grand Jury Further Charges That:**

On or about February 9, 2018, in the Western District of New York, the defendant, TRISTIN PEARSON, did knowingly distribute, and attempt to distribute, child pornography, as defined in Title 18, United States Code, Section 2256(8), that had been shipped and transported using any means and facility of interstate and foreign commerce, and that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

**All in violation of Title 18, United States Code, Sections 2252A(a)(2)(A) and 2252A(b)(1).**

**COUNT 3**  
**(Possession of Child Pornography)**

**The Grand Jury Further Charges That:**

Between on or about January 1, 2018, and on or about May 2, 2018, in the Western District of New York, the defendant, TRISTIN PEARSON, did knowingly possess material, that is, an iPhone bearing serial number FNNQF0A1G5MW, that contained images of child pornography, as defined in Title 18, United States Code, Section 2256(8), that is, images of Victim 1, a person known to the Grand Jury, that had been shipped and transported using any means and facility of interstate and foreign commerce; and that had been shipped and

transported in and affecting interstate and foreign commerce by any means, including by computer.

**All in violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and 2252A(b)(2).**

**FORFEITURE ALLEGATION**

**The Grand Jury Alleges That:**

Upon conviction of any of the offenses alleged in this Indictment, the defendant, TRISTIN PEARSON, shall forfeit to the United States any matter which contains any visual depiction of child pornography, which was produced, transported, mailed, shipped, and received, and any and all property, real and personal, used and intended to be used to commit and to promote the commission of such offenses, and all property traceable to such property, including but not limited to the following:

- 1) One (1) iPhone cellular telephone with Serial Number FNNQF0A1G5MW.

**All pursuant to Title 18, United States Code, Sections 2253(a)(1) and 2253(a)(3).**

DATED: Buffalo, New York, November 3, 2022.

TRINI E. ROSS  
United States Attorney

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A TRUE BILL:

S/FOREPERSON  
FOREPERSON